



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
401 CHURCH STREET
L & C ANNEX 6TH FLOOR
NASHVILLE TN 37243-1534

Addendum to Rationale
Including
Record of Comments and Responses
(Notice of Determination)

**General NPDES (National Pollutant Discharge Elimination System
Permit) for Discharges of Storm Water Runoff and Process Wastewater
Associated with Ready Mixed Concrete Facilities**

Permit No. TNG110000

October 5, 2007

Administrative Record

The permit rationale (or fact sheet) sets forth the Division of Water Pollution Control's (division) basis for permit conditions to be applied statewide for the issuance of the new General NPDES (National Pollutant Discharge Elimination System) Permit for Discharges of Storm Water Runoff and Process Wastewater Associated with Ready Mixed Concrete Facilities (RMCP). The general permit is intended to authorize the discharge of either storm water runoff or process wastewater, or both, from ready mixed concrete plants to waters of the state.

The current RMCP expires on November 14, 2007. The division issued Public Notices which announced its intent to issue the new RMCP general permit and to conduct a Public Hearing in Nashville, Tennessee. Copies of the draft permit, Rationale and Notice of Intent were made available on the division's web site at http://www.state.tn.us/environment/wpc/ppo/rmcp_tng110000.shtml. The proposed NPDES permit was drafted in accordance with the provisions of the Federal Water Pollution Control Act, the Tennessee Water Quality Control Act, and other lawful standards and regulations.

The division held a public hearing on Tuesday, August 14, 2007 at 1 p.m. (CDT), in the Ruth Neff Conference Room on the 17th Floor of the L & C Tower, at 4th Ave. and Church Street in downtown Nashville, Tennessee 37243-1534.

There were comments and questions from three groups, the Tennessee Concrete Association, a permittee of a Municipal Separate Storm Sewer System (MS4) and EPA, Region IV. This Addendum to Rationale serves as the division's response to the questions, comments and issues that were raised at the hearing and/or submitted during the subsequent comment period.

Comments received and responses

1. **Comment:** Why was a numeric effluent limit for “Total Recoverable Iron” added to the list of pollutants to be analysis for in the process wastewater?

Response: Slag, a byproduct from iron smelting, is one of the components in some ready mixed concrete recipes. “Total Recoverable Iron” was already listed as a parameter in the storm water monitoring, and it is likely that “Total Recoverable Iron” may be present from the slag in the process wastewater discharges as well. Therefore, “Total Recoverable Iron” was included as an effluent limit in the process wastewater streams.

2. **Comment:** It was suggested that it seems appropriate that this permit, as other general permits, should specifically prohibit illicit discharges into municipal separate storm sewer system (MS4), such as wash water from concrete truck cleanouts.

Response: The following discharge was added to the permit as an example of discharges that are not authorized by this permit:

“Direct discharges of concrete truck washout water to waters of the state including discharges to storm sewer.”

3. **Comment:** There was a question that there should be different pH ranges for subcoregions (and stream orders) across the State of Tennessee according to the January 2004 version of Rule 1200-4-3.

Response: This permit will be issued after the effective date, October 6, 2007, of revisions to Rule 1200-4-3. The revisions replaced the pH ranges for subcoregions and stream orders with two ranges of pH; 6.0 to 9.0 in wadeable streams and 6.5 to 9.0 in larger rivers, lakes, reservoirs and wetlands.

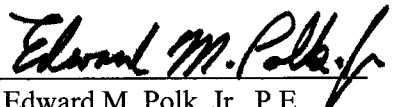
The division has applied the more stringent pH range of 6.5 to 9.0 for discharges authorized under this permit to all waters of the state.

There were a few typographic and grammatical corrections made to improve the meaning of the permit.

Determination

The division’s decision on this matter is to issue a General NPDES Permit for Discharges of Storm Water Runoff and Process Wastewater Associated with Ready Mixed Concrete Facilities, Permit No. TNG110000.

DATE: 10-22-07


Edward M. Polk, Jr., P.E.
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